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June 27, 2024

VIA ECF

Hon. Edgardo Ramos
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007-1312

Re: *Just Play, LLC v. A.S. Plastic Toys Co., Ltd., et al.*
Case No. 19-cv-9399
Status Letter

Dear Judge Ramos:

We represent Plaintiff Just Play, LLC (“Plaintiff”) in the above-referenced action and respectfully submit the instant letter in accordance with the Court’s April 29, 2024 Order. (Dkt. 113).

As indicated in Plaintiff’s April 26, 2024 status letter (Dkt. 112), Plaintiff’s counsel has been communicating with an attorney, who, upon information and belief, previously worked with Mr. Orel and now represents the Orel Defendants. Since the April 26, 2024 status letter, several of the Orel Defendants have been voluntarily dismissed. (Dkt. 115). Plaintiff’s counsel and new counsel for the Orel Defendants have just reached an agreement in principle for an additional Orel Defendant this week, and Plaintiff’s counsel expects that the settlement will be finalized within a few weeks. At this time, Plaintiff does not believe that it will reach settlements with any additional Orel Defendants. Accordingly, Plaintiff respectfully requests time to finalize the settlement agreement and file a notice of dismissal for the final Orel Defendant and respectfully requests to move for default judgment against the remaining Orel Defendants by no later than July 31, 2024.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

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